

**IN THE UNITED STATES
DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**UNITED STATES OF
AMERICA,**

V.

**CHRISTOPHER IMAN ULMER,
DEFENDANT.**

CASE NUMBER

2:06-CR-169-WHA-SRW

MOTION TO CONTINUE

COMES NOW, the defendant, Christopher Iman Ulmer, by and through the undersigned counsel and moves this Honorable Court to continue the Pretrial Conference by stating the following:

1. This Honorable Court set the Defendant's Pretrial Conference for April 2, 2007 at 3:00 p.m.
2. Counsel for the Defendant has a civil trial scheduled to begin at 9:00 a.m. on April 2, 2007 which should last two (2) days. *Susan S. DePaola, Chapter 7 Trustee for the Bankruptcy Estate of Philip L. Goodwyn and Simple Pleasures, Inc. v. V. Restaurants, Inc. and Vince Saele, Case Number 2:06-cv-00893-WKW.*
3. Counsel has spoken to the Government and they do not object to the continuance.

WHEREFORE, THE PREMISES CONSIDERED, Defendant prays that this Honorable Court will grant the foregoing and continue the change of plea hearing currently set for April 2, 2007.

RESPECTFULLY SUBMITTED this the 27th day of March, 2007.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043)
ATTORNEY FOR THE DEFENDANT
560 S. McDONOUGH ST., STE. A
MONTGOMERY, ALABAMA 36104
TELEPHONE 334-269-0269
FAX 334-323-5666

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Continue by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorney named below.

DONE this the 27th day of March, 2007.

/s/ [Daniel G. Hamm](#)

DANIEL G. HAMM (HAM043)
ATTORNEY FOR THE DEFENDANT
560 S. McDONOUGH ST., STE. A
MONTGOMERY, ALABAMA 36104
TELEPHONE 334-269-0269
FAX 334-323-5666

A. Clark Morris
John T. Harmon
Assistant United States Attorney
Post Office Box 197
Montgomery, Alabama 36101-0197